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Attorney for Defendant  
5 Eboni Tinner

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8  
9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 EBONI TINNER,

13 Defendant.  
14

Case No. 2:22-cr-00178-CDS-NJK

**ORDER RE:**

**MOTION FOR INTERNATIONAL  
TRAVEL AND TO TEMPORARILY  
RELEASE PASSPORT**

15 Yi Lin Zheng, counsel for defendant Eboni Tinner, moves this Court for an order  
16 allowing her to take a cruise outside of the United States. Ms. Tinner also requests that this  
17 Court temporarily release her passport should the Court grant her travel request.  
18

19 On August 8, 2022, the Court held a detention hearing and released Ms. Tinner on  
20 conditions of pretrial release. ECF No. 19. Ms. Tinner's travel was restricted to the continental  
21 United States and was ordered to surrender her passport. ECF No. 19 at 3. Ms. Tinner would like  
22 to take her family on a cruise to celebrate her son's birthday. The 4-day cruise to the Bahamas  
23 would depart from Miami, Florida on November 27, 2023 and return On December 1, 2023.  
24 Exhibit A.  
25  
26  
27  
28

Ms. Tinner's supervising pretrial services officer, Jessica Favela, does not object to Ms. Tinner's proposed travel. The government takes no position on the matter and leaves the decision to the sound discretion of the Court.

Based on Ms. Tinner's past eleven months of compliance while on pretrial supervision and the parties' respective positions on the matter, she respectfully asks this Court to grant her request to travel on her cruise. If the Court grants Ms. Tinner's request, she would also request an order temporarily releasing her passport to facilitate her travel. She would return the passport to Pretrial Services upon her return to Las Vegas.

DATED: July 26, 2022.

Respectfully submitted,  
Yi Lin Zheng  
Vegas Golden Law

By: /s/ Yi Lin Zheng

Yi Lin Zheng  
Vegas Golden Law  
Attorney for Eboni Tinner

### **ORDER**

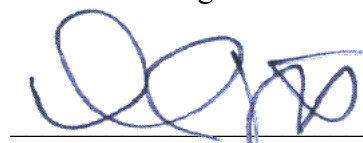
The Court grants Ms. Tinner's motion for international travel and to release passport. However, the Court will impose certain additional requirements that Ms. Tinner must follow. First, Ms. Tinner must provide her travel itinerary to her pretrial services officer prior to leaving. Second, after returning from her trip, Ms. Tinner must return her passport within 48 hours.

**IT IS THEREFORE ORDERED** that Ms. Tinner's motion for international travel and to release passport (ECF No. 74) is **GRANTED**.

**IT IS FURTHER ORDERED** that Ms. Tinner must provide her travel itinerary to her pretrial services officer prior to leaving for her trip.

**IT IS FURTHER ORDERED** that, within **48 hours** of returning from her trip, Ms. Tinner must return her passport.

DATED this 28th day of July, 2023.



DANIEL J. ALBRECHTS  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of Vegas Golden Law and is a person of such age and discretion as to be competent to serve papers.

That on July 26, 2022, she served an electronic copy of this MOTION FOR INTERNATIONAL TRAVEL AND TO TEMPORARILY RELEASE PASSPORT by electronic service (ECF) to the persons named below:

JASON FRIERSON  
United States Attorney  
EDWARD VERONDA  
Assistant United States Attorney  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, NV 89101

/s/ Yi Lin Zheng

Employee of Vegas Golden Law



# 4 Days Bahamas from Miami, FL

Ship: Carnival Conquest

Mon Nov 27, 2023 - Fri Dec 1, 2023

## Your Itinerary ^

**Day 1:** Miami | Departs at 3:30 PM

**Day 2:** Fun Day At Sea

**Day 3:** Half Moon Cay | 8:00 AM - 4:00 PM

**Day 4:** Nassau | 8:00 AM - 4:00 PM

**Day 5:** Miami | Arrives at 8:00 AM

